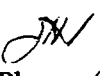




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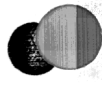
Sue Jacobson, Environmental Analyst III, Permitting & Enforcement

From: John H. Volk, Bureau Director 
Department of Agriculture Phone: (203) 874-0696 FAX: (203) 783-9976

October 4, 2002

Subject: Islander East Pipeline Project


The Bureau of Aquaculture staff concur with the position of the DEP that the Islander East Pipeline Project as proposed, is inconsistent with state policies, standards and criteria, including the State's coastal zone management program.



The proposed pipeline route is sited in a mapped shellfish concentration area that provides habitat for populations of eastern oysters (*Crassostrea virginica*), hard clams (*Mercenaria mercenaria*), soft clams (*Mya arenaria*), blue mussels (*Mytilus edulis*) and channel whelk (*Busycon canaliculatum*). Extensive privately owned shellfish grants, leased shellfish grounds and public shellfish lands are present. The submerged land through the proposed route that is not currently leased, is productive marine habitat and is a significant area for future expansion of the shellfish industry. Commercial shellfish aquaculture, transplant and harvest operations by established seafood businesses are performed year round within and adjacent to the proposed project area. All of Branford Town waters and the offshore areas under the exclusive jurisdiction of the Department of Agriculture have been classified as Shellfish Growing Areas in accordance with the National Shellfish Sanitation Program and meet the requirements of the U.S. Food and Drug Administration.

The proposed siting and construction methods for the marine phase of the project, will likely cause significant damage and harm to shellfish resources and shellfish habitat. The applicant proposes to use a combination of construction methods for pipeline installation including horizontal directional drill, mechanical dredge, sub-sea plow or jet sled and blasting if necessary.

The horizontal directional drill has a potential for frac-out and loss of drilling muds with associated contaminants into the environment causing damage to shellfish beds and marine organisms. Problems frequently occur with the use of this construction method as experienced on projects in the Housatonic River wetlands, Thames River and most recently in New Haven Harbor (Cross Sound Cable Project). The applicant has indicated a significant amount of drilling mud will be released into the environment at the proposed exit pit in the seafloor.



Islander East Pipeline Project

October 4, 2002

Page 2.

The use of mechanical dredge(s) to create the exit pit and open cut trench in the seafloor will cause significant environmental impacts and irreparable damage/alteration of habitat. These alterations of the sea floor profile will render the impacted area unsuitable for commercial fishing and shellfishing. The resultant topographic irregularities may adversely affect the efficiency and safety of the operation and handling of harvesting equipment employed by the local seafood industry. The mechanical dredging, handling of spoils, in-water storage of spoils and backfilling activities will cause impacts to shellfish resources and habitat due to suspended sediment and sediment transport. Additionally, the project will result in a multitude of "scars" and significant benthic irregularities caused by numerous sets of anchors, spuds and cable sweeps to maintain vessel and barge positions. Suspended sediment and scouring due to prop wash from tugs maintaining position and moving barges is significantly more disruptive than that of the normal boating and harvesting activity that takes place in the near shore area in and around the shellfish beds.

The use of a plow or jet sled for pipe burial through a sea floor corridor of approximately 23 miles, will result in impacts due to suspended sediment, alteration and /or destabilization of the sea floor, and damage or death to marine life.

An additional concern regarding this project and other proposed submarine utility projects, is the potential cumulative impacts to Long Island Sound's habitat, water quality and fisheries. We recommend that the siting and construction of utilities in the estuarine environment be avoided. These projects are not water dependent and conflict with established water dependent uses as defined by the state's coastal management program. In review of pending applications and proposed projects, cumulative impacts need to be considered. Alternatives and options regarding energy sources, siting and construction methods should be fully assessed.

In summary, Bureau staff supports the DEP's position for denial of the application. The proposed project will have significant adverse impacts to the marine habitat, resources and the shellfish industry.